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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No. 1:12-cv-00548



CHARLENE RAIFORD,

Plaintiff,

v.

NORTH CAROLINA CENTRAL  
UNIVERSITY, through the BOARD OF  
GOVERNORS OF THE UNIVERSITY OF  
NORTH CAROLINA and RAYMOND  
PIERCE, LAUREN COLLINS, and  
NICHELE PERRY in their individual  
capacities.

Defendants.

PLAINTIFF'S RULE 26(f) REPORT

1. Pursuant to Federal Rule of Civil Procedure 26(f), LR 16.1, and LR 26.1, a meeting was held by telephone conference on December 14, 2012, and was attended by Vince de la Cruz for Plaintiff and Kimberly D. Potter for Defendants.

2. Discovery Plan. The undersigned party proposes to the Court the following discovery plan:

Discovery will be needed on the following subject:

Whether Defendants violated Plaintiff's rights pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, et seq., as amended; the Age Discrimination in Employment Act, 29 U.S.C. § 1983; 42 U.S.C. § 1981; and the Equal Protection Clause of the Constitution of the United States.

Discovery shall be placed on a case-management track established in LR 26.1. The undersigned party proposes that the appropriate plan for this case is that designated in LR 26.1(a) as "Standard." The date for the completion of all discovery (general and expert) is April 18, 2013.

3. Mediation.

Mediation should be conducted early during the discovery period, with the exact date to be set by the mediator after consultation with the parties.

4. Other Items.

Plaintiff should be allowed until January 15, 2013 to request leave to join additional parties or amend pleadings.

Defendants should be allowed until January 15, 2013 to request leave to join additional parties or amend pleadings.


After these dates, the Court will consider, *inter alia*, whether the granting of leave would delay trial.

The parties have discussed special procedures for managing this case, including reference of the case to a magistrate judge on consent of the parties under 28 U.S.C. 636(c), or appointment of a master: Plaintiff does not consent to magistrate jurisdiction over the present case.

5. Trial of This Action.

The parties expect the trial of this case to take approximately three (3) days. A jury trial has been demanded.

Respectfully submitted, this 17<sup>th</sup> day of December, 2012.



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Counsel for Plaintiff

/s/Vince de la Cruz  
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Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that the foregoing **RULE 26(f) REPORT** was served upon the following by fax, mail, and electronic mail on December 17, 2012:

Kimberly D. Potter  
Special Deputy Attorney General  
N.C. Department of Justice  
P.O. Box 629  
Raleigh, N.C. 27602-0629  
Fax: 919-716-6764  
Email: kpotter@ncdoj.gov

This 17<sup>th</sup> day of December, 2012.

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